

## Environmental Policy

Babel's Environmental Policy was last reviewed in October 2024 and is published on the company's [website](#). Employee refresher training took place on 4<sup>th</sup> November 2024.

### Introduction

Babel is majority owned by its employees via an Employee Ownership Trust (EOT) and will continue to place our employees in the driving seat, building a sustainable, ethical agency ready for the future; one where people, purpose and planet come before profit.

Our environmental policy forms a key component of our employee-led focus and company values:

- / Uphold and be a champion of our company values; quality, collaboration and compassion.
- / Demonstrate professionalism, adhering to professional integrity and confidentiality.
- / Highly supportive of the company's social and environmental, HR, financial and operational responsibilities and go that extra mile to respect our clients, suppliers and how we treat our planet.

To ensure awareness, action and accountability by Babel employees, management and the board:

- / This policy is part of new employee training. Refresher training for existing employees is conducted on an annual basis or upon implementation of a new initiative.
- / Babel employee job descriptions include personal obligations to supporting environmental performance.
- / Babel employee performance objectives include a personal action to confirm adherence to the company's e-waste and home working procedures.
- / Babel employees are asked to provide evidence that they have participated in the company's e-waste reduction programme for the home and in the office, or to supply evidence of responsibly disposing/recycling products in accordance with the policies of their local authority.
- / The company conducts an annual review of this policy and our performance with the senior leadership team and board of directors. A key goal for 2025 is for the company to become a Carbon Literate Organisation (CLO) by May 2025.

### Key components of our environmental policy

Babel is committed to operating its business in an environmentally sensitive way. We recognise that effective environmental management practices are not only important in caring for our people and planet, but also makes good business sense. The company has identified the following as key impact areas:

- / Who we conduct our business with
- / Home working and travel
- / Responsible recycling/purchasing and consumption of water and energy

### It matters who we conduct business with

- / We are committed to working with clients and suppliers that align with our commitment to environmental sustainability, social responsibility, ethical business practices, and to protecting the planet. Clients and suppliers must demonstrate a track record of fair labour practices, non-discrimination policies, and social and environmental engagement.
- / This policy applies to all potential and existing clients and is mandatory for all decision-makers within the company. Senior management retains the discretion to consider organisations from innovative or emerging industries that show a commitment to positive environmental and social practices.
- / We categorically exclude industries known for significant negative environmental/social impacts:
  - Fossil fuel production and exploration (e.g., oil, natural gas, coal)
  - Tobacco manufacturing and distribution
  - Arms and weapons manufacturing
  - Industries primarily involved in deforestation activities

- Pornography and adult entertainment
- Gambling and betting industries
- / Our preferred purchasing policy prioritises suppliers that meet robust third-party social and environmental certification criteria. Examples of this third-party criteria include, but are not limited to:
  - Certified B Corporation
  - Soil Association Organic
  - Fair Trade
  - ISO 14001
  - Green Small Business
  - Planet Mark
  - TCO Certification (for IT products)
  - Other rigorous and independent third-party certifications will be considered on a case-by-case basis.
- / Employees are encouraged to find socially and environmentally responsible suppliers by searching, for example, [bcorporation.net/](https://bcorporation.net/) or [ethicalconsumer.org/](https://ethicalconsumer.org/), and by looking for the third-party certifications listed above. Our purchasing policy also reflects the critical importance of supporting local economic development, community prosperity and cultural diversity, as well as reducing transportation.
- / Examples of Babel suppliers include:
  - Our weekly fruit and vegetable box for employees is from [Eat Fruit](#) based in Covent Garden, London, a family business committed to supporting farmers and operating in the most sustainable manner, sourcing fruit growers they know, paying a fair price and choosing varieties in their fruit boxes for taste, not for aesthetic crates, and re-using returnable recyclable boxes.
  - Our local newspaper company delivers our papers on foot direct to our doorstep, and the newspapers are recycled responsibly.
  - We incorporate social and environmental considerations into our choice of insurance providers: [Howden](#) for business insurance – the fifth largest employee-owned business in the UK. Howden is committed to reducing its impact on the planet and improving environmental performance through numerous initiatives including the Howden Foundation, a registered charity with a mission to protect people against social and economic effects of climate change.
  - We make a conscious decision to use digital platforms to ‘meet’ and engage with our clients and suppliers, but when we do travel we book with [Battleface](#) who support international non-profit Kiva that facilitates crowdfunded loans for people underserved by financial institutions.
- / How we implement our client/supplier practices:
  - We conduct a pre-client/supplier review of environmental and social credentials/certifications.
  - Our last supplier audit was in October 2024 – our suppliers completed our questionnaire and submitted certification evidence.
  - We annually review our client portfolio to ensure ongoing alignment with our social and environmental policies. Our last client audit was in October 2024 – we used public information (industry reports, news articles, sustainability and ESG reports) for our screening.
  - We will update the list of excluded and priority industries annually, reflecting current environmental and social standards.
  - Our client/supplier policy is published on our website as part of this Environmental Policy, and supplied to clients/suppliers upon request, including procurement departments.
  - As a matter of day-to-day business, Babel’s senior leadership team seeks the approval of its peer group and/or the company’s CEO to ensure effective implementation and adherence of our policies.



## Home working – environmental stewardship

- / Products and practices: Babel employees are provided with computer equipment to carry out duties from home and we encourage employees to follow good environmental practices with regard to that equipment.
- / E-waste & hazardous materials:
  - Any electrical waste or hazardous materials, used in the home on behalf of Babel, should be returned to the Babel office and its disposal/recycling will be managed by our waste disposal contractors [First Mile](#). If that is not possible employees should follow the appropriate policies of their local authority. The company can provide names of preferred suppliers.
  - Batteries and paper should be disposed of in accordance with the employee's local authority's waste disposal and recycling services, and employees can bring in these items for recycling with First Mile.
- / Purchase of products for home use:
  - The company will provide the equipment and consumables employees need to work efficiently at home and will source those products according to good environmental practice. If employees have been given the authority to purchase equipment or consumables directly (and reclaim the cost), we encourage employees to follow that same practice to reduce environmental impacts.
- / Reducing carbon footprint at home:
  - Babel encourages employees to follow the advice of the Energy Saving Trust <https://energysavingtrust.org.uk/energy-at-home/>, both to reduce costs and the impact on the environment. In addition, we support the advice from our partner Green Small Business to:
    - Use LED bulbs in whatever space employees use for home working.
    - Turn off equipment overnight and to not leave laptops on charge.
    - Turn off equipment when not in use.
  - Employees should review information from the CSE on heating a home office: <https://www.cse.org.uk/advice/room-heaters/>
  - Employees should make informed choices on 'green' energy tariff information from the Ethical Consumer: <https://www.ethicalconsumer.org/energy/shopping-guide/energy-suppliers>
  - Employees should recycle consumable home items by following advice from the local authority, or they can bring those items to the office for recycling with First Mile.

## Travel impact reduction methods

- / Babel has a Use of Travel Policy, limiting corporate travel where it makes sense to do so. The company encourages its employees to reduce travel and use less sustainable modes only where necessary to ensure business effectiveness or personal health and safety.
- / Alternatives to travel: Babel encourages employees, suppliers, agency partners and associates to seek alternatives to travel through using and actively promoting the use of more sustainable ways of conducting business, for example the use of video meetings.
- / Public transport: Employees are encouraged to minimise car use and use public transport when undertaking Babel journeys. Public transport includes journeys by train, bus, taxi and ferry.
- / Cars & taxis: Babel will only reimburse employees the expenses for use of personal cars, hire cars, taxis (including tips) or motorcycles over 50cc, where a journey is necessary for the business and cannot reasonably be carried out by more sustainable means. Valid reasons for using personal cars, hire cars, taxis or motorcycles over 50cc include the following: No public transport available; Not using car or taxi would involve disproportionate delay, discomfort and inconvenience; Significant time saving, e.g. able to make earlier train connection; Need to carry heavy or bulky equipment; Risk of personal danger, e.g. waiting at stations late at night; Childcare commitment. Where the use of a taxi is required, e.g. to facilitate the use of public transport for the main part of a journey, electric taxis should be used wherever they are available.
- / Car insurance for business use: Employees travelling in their own vehicles for business purposes must have car insurance that includes business usage and must provide the company with evidence of the policy before travelling or car sharing with employees.



- / Pedal cycles: Use of pedal cycles is encouraged as part of the company's Cycle to Work scheme whereby interest-free loans of up to £1,000 can be made available to contribute towards the purchase of pedal cycles and necessary equipment (e.g. helmet, waterproofs and panniers).
- / Air travel: Babel discourages employees from travelling by air on business. Virtual meetings are preferred. Air travel will not be permitted for business journeys within mainland UK or for business journeys of less than 550km on mainland Europe. Public transport will also be encouraged for journeys which do not meet these criteria.
- / Projects requiring journeys which do not meet these criteria require the agreement of the company in advance of them being bid for or taken. A strong business case will need to be demonstrated for pursuing such projects. Consideration will be given to the fuel efficiency of the airline when booking air travel and only economy class travel will be permitted. The carbon emissions associated with any approved air travel will be offset via a Gold standard (or other recognised third party accreditation) carbon offsetting scheme. Where feasible, the costs of extra time of undertaking projects at distant locations should be carried by the client, along with the costs of using fuel efficient airlines and of carbon offsetting.

## Methods for reducing our environmental impact include:

- / Purchasing: We are committed to purchasing in a way that minimises negative environmental impacts and maximises the opportunities for positive outcomes for society and the environment. We encourage the purchase and use of materials, products, and services that reflect these commitments. We also purchase with a view to minimising waste and maximising efficiency, and purchase products and materials that are durable and long-lasting. We purchase recycled products, where possible, including printing paper, toners and cartridges, and recycled/ environmentally-friendly pens.
- / Recycling methods:
  - First Mile food waste recycling bins are in the kitchen and we use First Mile stickers for cardboard recycling.
  - We book First Mile services, approximately quarterly, for WEEE recycling and toner/cartridge recycling. Babel encourages employees to bring in their home e-waste products for recycling.
  - Mixed Recycling bins are located at the front and back of the office and feature clear signage as to what can be included: paper, envelopes and newspapers, cardboard and tetra pak, plastic bottles and carrier bags, metal tins and cans, and glass bottles and jars.
  - First Mile's carbon neutral fleet take our mixed recycling and sort at its state-of-the-art material recovery facility. The facility uses high tech systems to sort recyclable material into 14 different streams. A wide range of technology is used to separate materials, including infrared systems to identify plastic types and eddy currents to separate metals. Material is then collected, baled and sent to be recycled into new products.
- / Recycling recycled products:
  - Used printing paper recycled using the First Mile Mixed Recycling bags.
  - Used toner & cartridge recycling sacks are purchased from First Mile.
  - Empty toner bottles are sent for recycling and cartridges are refilled and sent to Sparks Children Charity. Sparks sell the cartridges, and the profits are used to fund pioneering medical research into various illnesses affecting children and babies.
  - Eat Fruit recyclable boxes are either returned or recycled responsibly for re-use.
- / In addition:
  - Babel operates a print policy to only print when required and absolutely necessary.
  - Electronic transfer of documents is used whenever possible. We rarely use physical methods.
  - Charitable donations have replaced Christmas gift giving.
  - Filtered cold water tap installed for drinking water.
  - Switching off all lights, fans, heaters and computers outside of office hours.
  - Hand dryers installed in the bathrooms and paper towels are not used in bathrooms.
  - Walls are painted white to reflect natural light and reduce unnecessary electricity usage.

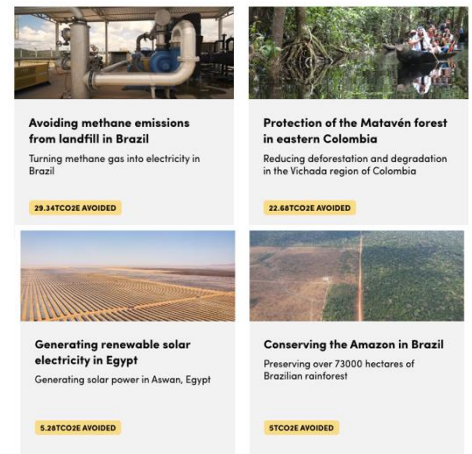


## Our Environmental Partnerships

### Ecologi

Ecologi is a platform for climate action, helping individuals, families and businesses become climate positive. Ecologi has funded the planting of over 25 million trees and offset nearly 950,000 tonnes of CO2e. Ecologi is B Corp Certified. Babel's partnership with Ecologi since April 2023 has resulted in 1,228 trees funded and 107.3 tCO2e avoided and we have supported 14 projects, including:

- Reforestation projects in the UK
- Generating renewable solar electricity in Egypt
- Conserving the Amazon in Brazil
- Preparing water boreholes in Eritrea
- Protection of the Matavénforest in eastern Colombia
- Protecting rainforest in a wildlife sanctuary in Cambodia
- Peatland restoration and conversation in Indonesia
- Wind power project in Mexico
- Turning local organic waste into electricity in India
- Distributing cleaner cookstoves in Kenya
- Solar PV electricity generation in Indonesia
- Generating wind power in the US
- Avoiding methane emissions form landfill in Brazil
- A solar power project in Morocco

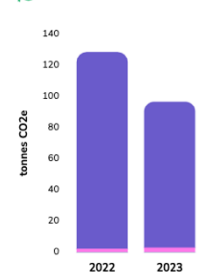


### Environmental and carbon footprint monitoring

- We regularly monitor and record emissions and have set specific reduction targets relative to previous performance (e.g. a 5% reduction of GHGs from baseline year).
- Our partnership with Green Small Business and annual certification allows Babel to monitor and improve its environmental and carbon footprint.
- We adhere to the action plan developed with Green Small Business to focus on reducing our carbon, and financially supporting the best environmental projects, and are guided by policies, including transport, client and supplier selection.



### Emissions



### First Mile

- For more than 15 years Babel has acted responsibly to improve our waste and carbon reduction initiatives by recycling with First Mile, including food recycling, cardboard recycling, printer ink cartridges and toner recycling, and WEEE recycling.
- First Mile is one of the first businesses in the waste management industry to become B Corp Certified.
- Via donations from every recycling sack First Mile sells, the company supports [Small Steps Project](#), an outreach programme in Nairobi supporting a world in which children no longer have to work on landfill.



## Télécoms Sans Frontières (TSF)

- / For more than four years we have volunteered 1,200 plus hours of our time to support and promote the extraordinary value and work of [Télécoms Sans Frontières](#), the world's first NGO focused on emergency-response technologies. The organisation enables victims of humanitarian crises to contact their loved ones and begin to regain control of their lives, as well as building rapid-response communication centres for local and international responders. Since its creation, TSF has been involved in over 150 major crises in more than 80 countries, providing communications to more than 11 million people and almost 1,000 NGOs.

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